UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

| GRAHAM ANDERSON, on Behalf of Himself) and All Others Similarly Situated, | Case No. 2:12-cv-03721-MAM |
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| Plaintiff, | CLASS ACTION |
| v.) | UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT |
| POLYMEDIX, INC., NICHOLAS LANDEKIC, EDWARD F. SMITH, and R. ERIC MCALLISTER, | |
| Defendants. | |

Pursuant to Federal Rule of Civil Procedure 23(e), and upon the Stipulation of Settlement, dated as of December 23, 2014 (the "Stipulation"), attached hereto as Exhibit 1,¹ Lead Plaintiff, by and through its respective counsel, respectfully moves this Court, for entry of an Order in the form attached as Exhibit A to the Stipulation (the proposed "Preliminary Approval Order"):

- 1. granting preliminary approval of the proposed Settlement on the terms set forth in the Stipulation;
- 2. preliminarily certifying a Settlement Class consisting of all Persons who purchased or otherwise acquired PolyMedix's common stock during the period between March 7, 2011, and May 10, 2012, inclusive, approving the proposed Plan of Allocation, and appointing Lead Plaintiff and Lead Counsel as representatives of the Settlement Class pursuant to Federal Rule of Civil Procedure 23;
- 3. approving the proposed substance and form of the Notice of Pendency of Settlement and Proof of Claim and Release Form, attached as Exhibits A-1 and A-2 to the Stipulation, to be mailed to Settlement Class Members and approving the Summary Notice, attached as Exhibit A-3 to the Stipulation, for publication in *Investor's Business Daily*, and

¹ Terms not defined herein shall have the meanings ascribed to them in the Stipulation.

posting of the Notice, Proof of Claim, and Stipulation on the Claims Administrator and Lead Counsel's websites;

- 4. preliminarily approving Lead Counsel's mutually agreed-upon Fee and Expense Amount;
 - 5. scheduling a Final Approval Hearing date; and
 - 6. ruling on such other matters as the Court may deem appropriate.

The Parties' proposed Preliminary Approval Order includes blanks for the date and time of the Final Approval Hearing, which the Court must complete in order to properly effectuate the Settlement. In this regard, Lead Plaintiff requests the following schedule, if the Court preliminarily approves the Settlement:

| Notice to be mailed to Settlement Class Members | Within 14 calendar days of PolyMedix's transfer agent providing Lead Counsel with the shareholder list (14 calendar days after entry of Preliminary Approval Order) |
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| Robbins Arroyo LLP and the claims administrator shall post the Summary Notice on their respective websites | Within 10 calendar days after entry of the Preliminary Approval Order |
| Motions in support of the Settlement, Plan of Allocation, and the Fee and Expense Award Shall be filed | No later than 21 calendar days prior to the Final Approval Hearing |
| Deadline to request exclusion from the Settlement Class | No later than 14 calendar days prior to the Final Approval Hearing |
| Deadline for Settlement Class Members to object to the Settlement | No later than 14 calendar days prior to the Final Approval Hearing |
| Deadline by which reply briefs must be filed | No later than 7 calendar days before the Final Approval Hearing |
| Final Approval Hearing | At least 90 days after entry of the Preliminary Approval Order, in accordance with the Court's availability |
| Deadline for Settlement Class Members to submit a Proof of Claim | Postmarked no later than 100 calendar days after entry of the Preliminary Approval Order |

Many of the dates for the events set forth above are tied either to the entry of the proposed Preliminary Approval Order or to the Final Approval Hearing date, which the Parties respectfully request be scheduled at least 90 days after the Notice Date, or at a later date at the Court's convenience. If this schedule is not convenient for the Court, the Parties request that the Court utilize similar time intervals for the events in completing the proposed Preliminary Approval Order.

Lead Plaintiff's uncontested motion is made pursuant to Rule 23 of the Federal Rules of Civil Procedure, and is based upon the Memorandum of Law, the Stipulation, all pleadings and papers filed in this action, and any such additional evidence or argument as may be required by the Court. For the reasons set forth in the Stipulation and the accompanying Memorandum of Law in Support, Lead Plaintiff respectfully requests that the Court find that the proposed Settlement merits preliminary approval.

Date: January 9, 2015 RYAN & MANISKAS, LLP

/s/ Richard A. Maniskas RICHARD A. MANISKAS (PA #85942)

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